

U.S. Magistrate Judge Paula McCandlis

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD SHARON,

Defendant.

CASE NO. MJ18-438

COMPLAINT for VIOLATION

Title 21, U.S.C. Sections 841(a)(1),
841(b)(1)(A) and Title 18 United States
Code Section 2

BEFORE Paula McCandlis, United States Magistrate Judge, U. S. Courthouse,
Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT ONE

(Possession of Methamphetamine with Intent to Distribute)

On or about September 20, 2018, in Seattle, Washington, within the Western
District of Washington, and elsewhere, the Defendant, RICHARD SHARON, did
knowingly and intentionally possess, and did aid and abet the possession of, with the
intent to distribute, methamphetamine, a controlled substance under Title 21, United
States Code, Section 812.

COMPLAINT/SHARON- 1
Case No. MJ18-438

UNITED STATES ATTORNEY
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1 It is further alleged that the offense involved five hundred (500) grams or more of
2 a mixture or substance containing a detectable amount of methamphetamine.

3 All in violation of Title 21, United States Code, Sections 841(a)(1) and
4 841(b)(1)(A) and Title 18, United States Code, Section 2.

5 And the complainant states that this Complaint is based on the following
6 information:

7 I, Geoffrey Provenzale, a Special Agent with the Drug Enforcement
8 Administration, being first duly sworn on oath, depose and say:

9 **I. INTRODUCTION AND AGENT BACKGROUND**

10 1. I am employed as a Special Agent (SA) with the United States Drug
11 Enforcement Administration (DEA), and have been so employed since April 2015. I am
12 currently assigned to the Seattle Field Division. In this capacity, I investigate violations
13 of the Controlled Substance Act, Title 21, United States Code, Section 801 et seq., and
14 related offenses. I have received specialized training in the enforcement and
15 investigation of the Controlled Substance Act. I have received over 620 hours of
16 classroom training including but not limited to, drug identification, drug interdiction,
17 detection, money laundering techniques and schemes, smuggling, and the investigation of
18 individuals and/or organizations involved in the illegal possession, possession for sale,
19 sales, importation, smuggling, cultivation, manufacturing and illicit trafficking of
20 controlled substances.

21 2. In my role as a Special Agent for the Drug Enforcement Administration, I
22 have negotiated for and purchased narcotics acting in an undercover capacity. I have
23 participated in narcotics investigations (i.e. heroin, fentanyl, cocaine, marijuana, and
24 methamphetamine) which have resulted in the arrest of individuals and the seizure of
25 illicit narcotics and/or narcotic-related evidence and the forfeiture of narcotics related
26 assets. I have been involved in the service of search warrants as part of these
27 investigations. As a result of my experience in serving these search warrants, I have
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1 encountered and have become familiar with various tools, methods, trends, paraphernalia
2 and related articles utilized by various traffickers in their efforts to import, conceal, and
3 distribute controlled substances. I am also familiar with the various methods of
4 packaging, delivering, transferring, and laundering drug proceeds. Additionally, through
5 my training and experience, I can identify illegal drugs by sight, odor, and texture.

6 3. I have written affidavits in support of court authorized federal warrants and
7 orders in the Western District of Washington for TIII interceptions, GPS tracking of
8 telephones, search warrants, and tracking of vehicles. Additionally, I have testified in
9 grand jury proceedings, written investigative reports, and conducted and participated in
10 numerous interviews of drug traffickers, of various roles within drug organizations, which
11 has provided me with a greater understanding of the methods by which drug trafficking
12 organizations operate.

13 4. I have obtained the facts set forth in this affidavit through my personal
14 participation in the investigation described below; from oral and written reports of other
15 law enforcement officers; and from records, documents and other evidence obtained
16 during this investigation. I have obtained and read official reports prepared by law
17 enforcement officers participating in this investigation and in other investigations by the
18 DEA. When I refer to registration records for vehicles, I am relying on records obtained
19 from the Washington State Department of Licensing (DOL). Insofar as I have included
20 event times in this affidavit, those event times are approximate.

21 5. As set forth below, there is probable cause to believe that Defendant
22 RICHARD SHARON possessed methamphetamine with the intent to distribute it, in
23 violation of Title 21 of the United States Code. Since this affidavit is being submitted for
24 the limited purpose of establishing that probable cause, I have not included every fact
25 known concerning this investigation. I have set forth only the facts that I believe are
26 essential for a fair determination of probable cause.

II. SUMMARY OF PROBABLE CAUSE

A. INFORMATION REGARDING INVESTIGATION OF SHARON

6. The DEA and Seattle Police Department (SPD) have been investigating RICHARD SHARON who distributes narcotics, including crystal methamphetamine, in the Western District of Washington. During August 2018, through the use of a confidential source (CS1)¹, investigators conducted a controlled purchase from SHARON of a quantity of crystal methamphetamine in excess of 500 grams.

7. Subsequent to the controlled purchase, through a state authorized court order, investigators obtained tracking information for a vehicle registered to SHARON: a 2002 Infiniti Q45, Washington license plate number ACG2169 (hereinafter target vehicle); and a phone associated with SHARON: 206-618-2421 (hereinafter target telephone). Location tracking data of both the target vehicle and target telephone, as well as information received from "ActivSpace" revealed that SHARON utilized an office space, located at 10015 Lake City Way NE, Unit #328, Seattle, Washington (hereinafter target location), on a regular basis.

B. SEARCH WARRANT EXECUTION

8. Based on the information outlined above, I obtained federal search warrants from this Court for the target location and target vehicle on September 19, 2018. Those warrants were executed on September 20, 2018.

9. On September 20, 2018, at approximately 10:00 a.m., investigators established surveillance at the target location. At approximately 10:15 a.m., I observed the target vehicle and SHARON arrive at the target location. On the same date, during the afternoon, CS1 contacted SHARON and agreed to meet with SHARON to purchase

¹ According to NCIC, CS1 was convicted before 2011 in the Western District of Washington for Conspiracy to Distribute a Controlled Substance, Distribution of Cocaine, Possession with Intent to Distribute Cocaine and Possession with Intent to Distribute Methamphetamine. CS1 was arrested in 2018 for distribution of controlled substances and is cooperating with law enforcement for sentencing consideration.

1 approximately 3 kilograms of crystal methamphetamine from SHARON. CS1 and
2 SHARON agreed to meet at a grocery store parking lot in Seattle, Washington.

3 10. At approximately 5:15 p.m., an investigator observed SHARON exit the
4 target location and enter into the target vehicle. Tracking data indicated the target vehicle
5 travelled directly to the grocery store parking lot. At approximately 5:28 p.m., I
6 observed the target vehicle arrive in the grocery store parking lot and park. At a neutral
7 location, CS1 and his/her vehicle were searched prior to the meeting with SHARON.
8 Both CS1 and the vehicle had no unauthorized items or contraband. CS1 was then given
9 \$21,000 in official funds and a recording device by investigators. Investigators then
10 followed CS1 directly to the grocery store parking lot.

11 11. At approximately 5:45 p.m., I observed CS1 arrive in the grocery store
12 parking lot and enter into the passenger's side of the target vehicle empty handed.
13 Shortly thereafter, CS1 exited the target vehicle carrying a large shoe box. SPD Officers
14 then arrested SHARON inside the target vehicle. I seized the shoebox from CS1 and
15 observed two large packages inside of it containing what appeared to be, based upon my
16 training and experience, multiple pounds of crystal methamphetamine. CS1 stated it was
17 approximately three kilograms and he/she had received it in the vehicle from SHARON
18 in exchange for the official funds. The material in the shoe box weighed 3,039.1 grams,
19 and field tested positive for methamphetamine.

20 12. SHARON was placed under arrest and read his *Miranda Rights*. SHARON
21 stated he understood his rights. SHARON was informed that investigators had a search
22 warrant for the target vehicle and the target vehicle was then searched by law
23 enforcement. Investigators seized the \$21,000 in official funds from the inside of the
24 target vehicle.

25 13. SHARON stated to investigators that he had just "sold" to CS1 the last of
26 the methamphetamine he had on hand. SHARON stated that within the target location
27 investigators would find about a "pound of duff" and a small quantity of
28 methamphetamine within his desk. SHARON described "duff" as the powder/shards of

1 methamphetamine that had been left over from larger quantities. He stated it normally
2 accumulated in the bottom of bags containing large quantities of methamphetamine.

3 14. At approximately 7:12 p.m., investigators executed the search warrant at
4 the target location. Upon a search of the target location, investigators located quantities
5 of methamphetamine consistent with SHARON's statements. The "duff" material
6 weighed 203.3 grams and field tested positive for methamphetamine. In addition,
7 investigators located drug ledgers, multiple gallon size Ziploc bags, and a large bucket of
8 "cutting" material, I know from my training an experience is used by drug traffickers to
9 add to controlled substances to increase their volume for sale. SHARON later stated the
10 cutting material was used to "cut" methamphetamine. Based on my training and
11 experience, these items are consistent with distribution of narcotics.

12 III. CONCLUSION

13 15. Based on the above facts, I respectfully submit that there is probable cause
14 to believe that Defendant RICHARD SHARON did knowingly and intentionally possess

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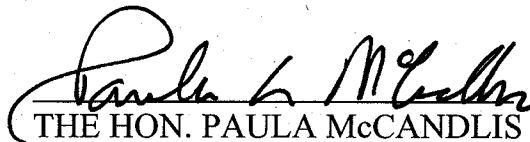
1 methamphetamine with the intent to distribute it, in violation of Title 21, United States
2 Code, Sections 841(a)(1), 841(b)(1)(A) and Title 18 United States Code Section 2.

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5 GEOFFREY PROVENZALE,
6 Complainant
7 Special Agent, DEA

8 Based on the Complaint and Affidavit sworn to before me, and subscribed in my
9 presence, the Court hereby finds that there is probable cause to believe the Defendant
10 committed the offense set forth in the Complaint.

11 Dated this 21st day of September, 2018.

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15 THE HON. PAULA McCANDLIS
16 United States Magistrate Judge
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